

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re

Chapter 11

SCUNGIO BORST & ASSOCIATES, LLC,

Case No. 22-10609 (AMC)

Debtor.

**DECLARATION IN SUPPORT OF MOTION FOR AN ORDER
GRANTING RELIEF FROM THE AUTOMATIC STAY AND
PERMITTING ACTION TO PROCEED IN STATE COURT**

DAVID TOLCHIN states the following to be true pursuant to 28 U.S.C. § 1746:

1. I am an attorney licensed to practice law in the State of New York, and have an application pending for admission pro hac vice to this Court. I am an associate of Jaroslawicz & Jaros PLLC, counsel for the movant Hasan Tahiraj (“**Plaintiff**” or “**Movant**”).

2. The following exhibits are submitted in support of Plaintiff’s motion:

Exhibit A Discloser of Insurance Policy by Debtor’s pre-petition insurance-appointed counsel in the State Court Action.

Exhibit B Summons and Complaint filed pre-petition against Debtor in the *Tahiraj v. Brooklyn Kings Plaza LLC, et al.*, Index No. 513231/2016, New York State Supreme Court, Kings County (the “**State Court Action**”)

Exhibit C Debtor’s Answer in the State Court Action, filed by its pre-petition insurance-appointed counsel

Exhibit D Order remanding the State Court Action back to State Court a year after it was removed to E.D.N.Y.

Exhibit E Order consolidated two other actions into the State Court Action.

Dated: April 11, 2022

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by: 

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